UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

UNITED STATES OF AMERICA,)	
)	CASE NO. 3-22-MJ-4149
v.)	
)	
JUSTIS ELLEN JOHNSON)	

MOTION FOR DETENTION HEARING AND DETENTION

The United States of America, by and through Mark H. Wildasin, United States Attorney, and Monica R. Morrison, Assistant United States Attorney for the Middle District of Tennessee, requests a hearing pursuant to 18 U.S.C. § 3142(f)(1)(A), which mandates a hearing upon motion of the United States in a case that involves a crime of violence.

In this case, the defendant was indicted on April 6, 2022, with one count, under chapter 110, for Production of Child Pornography, in violation of 18 U.S.C. § 2251(a), and one count, under chapter 110, for Distribution of Production of Child Pornography, in violation of 18 U.S.C. § 2252(A)(a)(2), and one count for Destruction or Removal of Property to Prevent Search or Seizure, in violation of 18 U.S.C. § 2232(a). Pursuant to 18 U.S.C. § 3156(a)(4)(C), the term "crime of violence," as used in 18 U.S.C. § 3142(f)(1)(A), includes any felony under chapter 109A, 110, or 117. Therefore, the United States is entitled to a detention hearing in this case.

The United States further moves that the Court detain the defendant unless she is able to overcome the rebuttable presumption, pursuant to 18 U.S.C. § 3142(e)(3)(E), that no conditions, or combination of conditions, will reasonably assure her presence in court or the safety of the community, if this Court finds that there is probable cause to believe that the defendant committed an offense under 18 U.S.C. §§ 2251 or 2252A.

The United States further moves for a continuance of three days in order to prepare for the detention hearing.

Respectfully submitted,

MARK H. WILDASIN United States Attorney for the Middle District of Tennessee

/s/ Monica R. Morrison
Monica R. Morrison
Assistant United States Attorney
110 Ninth Avenue South, Suite A-961
Nashville, Tennessee 37203-3870
Telephone: 615/736-5151

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing will be served on defense counsel at or before the time of the initial appearance in this case.

On this, the 15th day of April, 2022.

/s/ Monica R. Morrison
Monica R. Morrison